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Counsel for Federal Defendant

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION**

WESTERN ORGANIZATION OF)
RESOURCE COUNCILS, *et al.*,)

Plaintiffs,)

v.)

U.S. BUREAU OF LAND)
MANAGEMENT,)

Defendant, and)

STATE OF WYOMING,)

Intervenor Defendant.)
_____)

Case No. 4:20-cv-00076-BMM-JTJ

**FEDERAL DEFENDANT'S
UNOPPOSED MOTION FOR
EXTENSION OF TIME**

Federal Defendant the United States Bureau of Land Management respectfully requests a three-week extension of its deadline for filing its combined response to the summary judgment motion filed by Plaintiffs Western Organization of Resource Councils *et al.* (together, “WORC”) on October 29, 2021, ECF No. 49, and an adjustment of the remainder of the briefing schedule.

Counsel for Federal Defendants have contacted counsel for WORC, which does not oppose this motion, and for Intervenor-Defendant State of Wyoming, which takes no position on this motion. Pursuant to Local Rule 7.1(c)(3), a proposed order is attached as Exhibit 1.

This extension of time is required to afford undersigned counsel additional time to coordinate with the agency and complete Federal Defendants’ response in light of conflicting deadlines in cases that said counsel is litigating in in multiple fora, including preliminary injunction proceedings, this month, as well as to accommodate existing annual leave. Counsel have negotiated a schedule to accommodate this requested time without impacting the hearing currently scheduled on that motion for March 14, 2022.

Accordingly, Federal Defendants respectfully request that this Court extend the deadlines for briefing on dispositive motions set forth in this Court’s Order issued October 12, 2021, ECF No.46. Specifically, Federal Defendants request an order resetting these deadlines as follows:

A. Federal Defendant will file its combined response to Plaintiffs' motion and cross-motion for summary judgment by **January 7, 2022**.

B. Intervenor Defendant will also file its combined responses to Plaintiffs' motion and cross-motion for summary judgment by **January 7, 2022**.

C. Plaintiffs will file their combined reply in support of summary judgment and response to Federal Defendant's and Intervenor Defendant's cross-motions for summary judgment by **February 4, 2022**.

D. Federal Defendant will file its reply in support of summary judgment by **February 25, 2022**.

E. Intervenor Defendant will also file its reply in support of summary judgment by **February 25, 2022**.

Respectfully submitted this 17th day of December, 2021.

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/s/ Arwyn Carroll
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